

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
OXFORD DIVISION

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GEORGE WELCH,

PLAINTIFF

VS.

CAUSE NO.: 3:20-CV-00122-NBB-JMV  
Jury Trial Demanded

CITY OF HERNANDO,  
MISSISSIPPI, ET AL.

DEFENDANTS

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PLAINTIFF'S INITIAL DISCLOSURES  
IN COMPLIANCE WITH F.R.C.P. 26(a)(1)

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COMES NOW, Plaintiff, George Welch, by and through undersigned counsel, and hereby makes the following disclosures as required by the Federal Rule of Civil Procedure 26(a)(1). These disclosures do not include the names of any potential experts retained or consulted by Plaintiff. The Plaintiff will produce information relating to experts, if any, as may be appropriate under Federal Rule of Civil Procedure 26(a)(2) at the times provided by that Rule or any supervening order of the Court. In addition, the underlying disclosures, produced in good faith, are those currently known to the Plaintiff, who reserves the right to amend and supplement said disclosures in the event further information is discovered and/or required under the Rule. These disclosures do not constitute waiver of any work-product protection, attorney-client privilege, and are without prejudice to any other issue or argument.

**A. Individuals who may have discoverable information relevant to disputed facts  
alleged with particularity in the pleadings.**

1) Mr. George Welch

Can be reached through counsel for Plaintiff

Information includes full knowledge of the subject incident with the City of Hernando Police Officers (Officer Joseph Harris, Officer Robert Scott, Officer Roger Swatzyna and Officer A. Lewis) and subsequent injuries sustained by Plaintiff.

2) Officer Joseph Harris

Hernando Police Department  
2601 Elm St.  
Hernando, MS 38632

Information includes full knowledge of the subject incident involving Officer Joseph Harris, Officer Robert Scott, Officer Roger Swatzyna and Officer A. Lewis, and the Plaintiff at the Plaintiff's residence at 1777 Trapper Drive, Hernando, MS 38632.

3) Officer Robert Scott

Hernando Police Department  
2601 Elm St.  
Hernando, MS 38632

Information includes full knowledge of the subject incident involving Officer Joseph Harris, Officer Robert Scott, Officer Roger Swatzyna and Officer A. Lewis, and the Plaintiff at the Plaintiff's residence at 1777 Trapper Drive, Hernando, MS 38632.

4) Officer Roger Swatzyna

Hernando Police Department  
2601 Elm St.  
Hernando, MS 38632

Information includes full knowledge of the subject incident involving Officer Joseph Harris, Officer Robert Scott, Officer Roger Swatzyna and Officer A. Lewis, and the Plaintiff at the Plaintiff's residence at 1777 Trapper Drive, Hernando, MS 38632.

5) Officer A. Lewis

Hernando Police Department  
2601 Elm St.  
Hernando, MS 38632

Information includes full knowledge of the subject incident involving Officer Joseph Harris, Officer Robert Scott, Officer Roger Swatzyna and Officer A. Lewis, and the Plaintiff at the Plaintiff's residence at 1777 Trapper Drive, Hernando, MS 38632.

6) Beverly Harris

[REDACTED]

Information regarding injuries sustained by Plaintiff, as well as photographs she obtained of said injuries to Plaintiff's back.

**B. Categories and location of Documents**

Currently, there are no documents to disclose to Defendants at this time. Plaintiff reserves the right to amend this disclosure if and/or once disclosure is necessary and/or required pursuant Rule 26.

**C. Computation of Damages**

As such, Plaintiff will provide information related to his injury through the discovery process. Plaintiff has not fully computed his damages. With that said, he suffered the following:

1. Deprivation of his constitutional rights; and
2. Pain and suffering.

**D. Insurance**

There are no insurance agreements under which any persons carrying on an insurance business may be liable to satisfy all or part of a judgment which may be entered in favor of or to indemnify or reimburse Defendants for payments to satisfy the judgment.

Respectfully submitted this the 24<sup>th</sup> day of August, 2020.

ATTORNEYS FOR PLAINTIFF

/s/ John Keith Perry, Jr.

John Keith Perry, Jr. (MSB#: 99909)

Garret T. Estes (MSB# 105517)

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**CERTIFICATE OF SERVICE**

I certify that, on August 24<sup>th</sup>, 2020, I electronically filed a true and correct copy of the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following counsel of record:

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/s/ John Keith Perry, Jr.  
John Keith Perry, Jr.